

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**  
7-29-2008  
JUL 29 2008

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

IN RE: TAX DISCLOSURE OF	)	
	)	
	)	No. 08 CR 109
AUSTIN COMMUNITY RESOURCE	)	Hon. Milton Shadur
CENTER,	)	
RJC MANAGEMENT,	)	
THERESA J TUCKER,	)	
d.b.a. TUCKER ENTERPRISES,	)	
CG PRODUCTIONS,	)	
DIVERSIFIED INVESTMENT LLC,	)	
LYRICAL ENTREPENOURS	)	
PRODUCTIONS,	)	
C&D INVESTMENT,	)	
WOMEN EMPOWERED BY	)	
GROWTH & DEVELOPMENT,	)	
NUBIAN 5 PRODUCTIONS, and	)	
YOUTH AGAINST GANG ACTIVITY	)	

**APPLICATION FOR ORDER TO DISCLOSE TAX  
RETURNS AND RETURN INFORMATION AT TRIAL**

The United States of America, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, pursuant to 26 U.S.C. § 6103(i)(4)(A)(i) and (A)(ii), makes application to the Court for an order, authorizing the government to disclose tax returns and return information of:

Austin Community Resource Center  
RJC Management  
Theresa J Tucker  
CG Productions  
Diversified Investments  
Lyrical Entrepenours Productions  
C&D Investment  
Women Empowered By Growth & Development  
Nubian 5 Production  
Youth Against Gang Activity

which tax returns and return information are described as:

Form 3050  
Certified INOLES transcripts

In support of his application, applicant avers the following:

(1) Defendant has been indicted for violations of mail fraud and wire fraud in connection with a scheme to defraud payroll companies and banks through the creation and control of sham companies.


(2) On April 4, 2008, the government provided the tax returns and return information described herein as part of its Rule 16 disclosures, unaware of its need to seek court approval for such disclosures.

(3) The above-described tax returns and return information are probative of a matter in issue relevant to establishing the commission of the crime charged in that the ten companies listed above are companies that defendant Lockhart created and controlled, and which he used in order to defraud payroll companies and banks. In addition, the correspondence between on the one hand, Lockhart and the individuals whom he controlled, and, on the other hand, the IRS, regarding the issuance of Employee Identification Numbers for the ten companies comprise several of the charged mailings and wirings.

WHEREFORE, applicant prays the Court enter an order on this application authorizing disclosure by the Government of the tax returns and return information specified herein.

Respectfully submitted,

  
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Date: July 29, 2008